

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARY LALIBERTE, *et al.*,

Plaintiffs,

v.

QUANTA SERVICES, INC.,

Defendant.

Case No: 4:22-cv-03290

JOINT MOTION TO RESET CLASS CERTIFICATION HEARING

Plaintiffs Mary Laliberte and Marie McKnight (together, “Plaintiffs”), and Defendant Quanta Services, Inc. (“Defendant,” and with Plaintiffs, the “Parties”), by and through their undersigned counsel, respectfully move the Court for entry of an Order resetting the hearing on Plaintiffs’ motion for class certification currently scheduled for December 6, 2024 to January 8, 2025 or another time at the Court’s convenience (the “Motion”).

This Motion is based on the following grounds:

1. On September 20, 2024, Plaintiffs filed a motion for class certification. *See* ECF No. 71.
2. On October 1, 2024, the Parties filed a joint motion seeking entry of a briefing schedule regarding Plaintiffs’ motion for class certification, *see* ECF No. 75, which the Court entered. *See* ECF No. 76.
3. On November 1, 2024, Defendant filed its opposition to Plaintiffs’ motion for class certification, *see* ECF No. 77, and a motion requesting that the Court schedule a hearing on Plaintiffs’ motion for class certification. *See* ECF No. 79. Plaintiffs subsequently filed a reply in

further support of their motion for class certification and the motion is now fully briefed and ripe for hearing.

4. On November 20, 2024, the Court granted Defendant's motion and scheduled a hearing on Plaintiffs' motion for class certification for December 6, 2024 at 11:00 a.m. *See* ECF No. 81.

5. Plaintiffs' counsel has an unavoidable conflict on December 6, 2024 and, promptly after the Court's scheduled the hearing for that date, conferred with Defendant's counsel to determine alternative mutually available dates for the hearing on Plaintiffs' motion for class certification.

6. Counsel for the Parties are each available on January 8, 2025.¹

7. This Motion is made in good faith and to ensure each of the Parties has an opportunity to appear at the hearing on Plaintiffs' motion for class certification, and not for the purpose of delay or any improper purpose.

8. No prejudice to any of the Parties will result if the Motion is granted, as Plaintiffs' motion for class certification is fully briefed and dispositive motions in this action are due on December 20, 2024, with briefing on any such motions to be completed by March 4, 2025. On the contrary, the Motion is made to alleviate any prejudice by enabling the Parties to appear at the hearing on Plaintiffs' motion for class certification.

WHEREFORE, the parties jointly and respectfully request that the Court reset the hearing for class certification scheduled for December 6, 2024 to January 8, 2025 or another date convenient for the Court.

¹ Prior to filing this Motion, the Parties reached out to Chambers and understand that the Court may be available for the class certification hearing on January 8, 2025.

Dated: November 25, 2025

Respectfully submitted,

/s/ John S. "Jack" Edwards, Jr.

John S. "Jack" Edwards, Jr.
Texas Bar No. 24040851
S.D. Tex. No. 38095
AJAMIE LLP
Pennzoil Place - South Tower
711 Louisiana, Suite 2150
Houston, TX 77002
Telephone: (713) 860-1600
Facsimile: (713) 860-1699
Email: jedwards@ajamie.com

James C. Shah
Attorney-In-Charge
Alec J. Berin
MILLER SHAH LLP
1845 Walnut Street, Suite 806
Philadelphia, PA 19103
Telephone: (866) 540-5505
Facsimile: (866) 300-7367
Email: jcshah@millershah.com
ajberin@millershah.com

*Counsel for Plaintiffs, the Plan,
and the Proposed Class*

/s/ Jeremy P. Blumenfeld

Jeremy P. Blumenfeld
Attorney-In-Charge
Pennsylvania Bar No. 85955
1701 Market Street
Philadelphia, PA 19103
Telephone: (215) 963-5000
jeremy.blumenfeld@morganlewis.com

David J. Levy
Texas Bar No. 12264850
S.D. Tex. No. 13725
1000 Louisiana Street, Suite 4000
Houston, Texas 77002
Telephone: (713) 890-5000
david.levy@morganlewis.com

Counsel for Defendants